

PROPOSAL PAPER

Independent Technical Panel on Demand Management Measures Final Report on California Landscape Water Use *12-15-15 Draft*

Section 7

Section Title: Complementary Policies and Regulations,

Recommendation #: 8 - Water Budget Performance Reporting

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Background: The state has responded to the current extraordinary drought with a mandatory 25% reduction in urban water use statewide, implemented through emergency regulations adopted by the State Water Resources Control Board (SWRCB). In 2014, emergency regulations banned certain types of wasteful use and instituted monthly reporting requirements regarding water production by purveyors. In May 2015, emergency regulations implemented the Governor's directive for a 25% reduction by assigning individual water suppliers a water use limit based in part on their relative levels of residential gallons per capita per day (R-GPCD).

Even before the current drought took on such a critical dimension, the state's Water Action Plan of 2014 called for conservation to become a "California way of life". With the state's economy rebounding and population growing, coupled with a growing awareness that past levels of water withdrawals from the Sacramento and Colorado River Basins may not be sustainable, state officials, water suppliers, and NGOs are now beginning to direct attention to long-term (non-drought) conservation and efficiency standards for urban water suppliers.

Many water suppliers have expressed concern about various aspects of the current emergency regulations based on R-GPCD. While the public response had been exceptionally strong, the longer the emergency regulations are in place, the more likely that inequities will arise based on differentials of economic and population growth, and weather effects, among other factors. While R-GPCD may be viewed as a relative measure of water efficiency in the residential sector, it is not a metric that measures water efficiency in an absolute sense.

In early November, the Inland Empire Utilities Agency and several other water agencies (along with California Building Industry Association) wrote to the State Board proposing a permanent (non-drought) performance standard for water suppliers based on the water budget concept. Their underlying premise is that it is now becoming both technically possible and far less costly for water suppliers to maintain (and update) parcel-level irrigated area, for integration with individual customer water use data and localized ET (not static, reference ET) to measure actual water use against an ET-based water budget. IUEA and their cosigners point to the water budgets adopted in new MWELO as the logical and appropriate standard to apply to determine whether water suppliers are meeting a state-established efficiency target.

This approach is being enabled by the rapid advancement and commercialization of aerial imagery acquisition, automated land cover assessment, parcel map digitization, and water customer database

integration. Currently, a vendor is working for IUEA and the local agencies in the Santa Ana Basin to assemble all this information and provide dashboards for each utility to access the data. Other firms are beginning to offer similar services.

Taken together, these developments offer an answer to the urgent need to effectively codify and enforce water efficiency for existing landscapes based on the water budget and ETAF specified in MWELo, which in the past has been difficult to track and largely lacking in enforcement.¹ At least one pathway for doing so, now suggested by several water agencies, is for there to be a state regulation that establishes a water use standard grounded in MWELo for each urban water supplier. While the IEUA proposal extends beyond landscape water use to encompass all water uses, the Panel recommends that landscape water use be addressed in a regulation based on the water budget concept, either on its own or in combination with a more comprehensive efficiency standard for water suppliers.

Recommendation Purpose Statement: The purpose of this recommendation is to ensure that steady progress is made toward reducing unnecessary landscape water use. This would be accomplished by the annual reporting of the aggregate landscape water use in the service area of each urban water supplier for comparison with a standard based on the ET-based water budget applicable to landscapes in the service area based on current MWELo.

Recommendation: The State Water Resources Control Board, following stakeholder involvement and comment, should develop and adopt a non-drought regulation for the efficiency of landscape water use. After sufficient notice and opportunity for data gathering, each water supplier should report landscape water use on an annual basis, along with the ET-based water budget applicable to all landscapes in the service area for that year based on current MWELo, together with steps taken, or to be taken, to bring excessive landscape water use down to the levels specified in MWELo. For other particulars of such a regulation, including phase-ins and exceptions, we defer to the Board and stakeholders.

Add a funding component

¹ It should be noted that since its inception in 1993, MWELo has specified an ET adjustment factor of 0.8 for existing landscapes, although the mechanism for monitoring, verifying, and enforcing this standard was never prescribed.